ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ESSION NBR:9210220132 DOC.DATE: 92/10/19 NOTARIZED: NO DOCKET #
ACIL:50-400 Shearon Harris Nuclear Power Plant, Unit 1, Carolina 05000400
AUTH.NAME AUTHOR AFFILIATION
VAUGHN,G.E. Carolina Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 920917 ltr re violations noted in insp rept 50-400/92-15.Corrective actions:handling limitations for new & irradiated fuel inserts,will be revised specifically to describe handling requirements for new fuel inserts.

DISTRIBUTION CODE: IE01D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 4
TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:Application for permit renewal filed. 05000400

	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL
	PD2-1 PD	1	1	LE,N	1	1
INTERNAL:	ACRS	2	2	AEOD	1	1
	AEOD/DEIB	2	2	AEOD/DSP/TPAB	1	1
	AEOD/TTC	1	1	DEDRO	1	1
	NRR MORISSEAU,D	1	1	NRR/DLPQ/LHFBPT	1	1
	NRR/DLPQ/LPEB10	1	1	NRR/DOEA/OEAB	1	1
	NRR/DREP/PEPB9H	1	1	NRR/PMAS/ILRB12	1	1
	NUDOCS-ABSTRACT	1	1	OE DIR	1	1
	OGC/HDS1	1	1	REG FILE 02	1	1
	RGN2 FILE 01	1	1			
EXTERNAL:	EG&G/BRYCE,J.H.	1	1	NRC PDR	1	1
	NSIC	1	1			

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK, ROOM P1-37 (EXT. 504-2065) TO ELIMINATE YOUR NAME FROM DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 24 ENCL 24

I
D
S
/
A
D
D
S

CP&L
Carolina Power & Light Company
P.O. Box 165 • New Hill, NC 27562
HARRIS NUCLEAR PROJECT
P.O. Box 165
New Hill, NC 27562

G. E. VAUGHN
Vice President
Harris Nuclear Project
OCT 1 9 1992

Letter Number: HO-920139

Document Control Desk
United States Nuclear Regulatory Commission
Washington, DC 20555

NRC-790

SHEARON HARRIS NUCLEAR POWER PLANT
DOCKET NO. 50-400
LICENSE NO. NPF-63
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

In reference to your letter of September 17, 1992, referring to NRC Inspection Report RII: 50-400/92-15, the attached is Carolina Power and Light Company's reply to the notice of violation identified in Enclosure 1.

It is considered that the corrective actions taken/planned are satisfactory for resolution of the violation.

Thank you for your consideration in this matter.

Very truly yours,

G. E. Vaughn
Vice President
Harris Nuclear Project

MGW:kls

Attachment

cc: Mr. S. D. Ebneter (NRC-RII)
Mr. N. B. Le (NRC-NRR)
Mr. J. E. Tedrow (NRC-SHNPP)

MEM/HO-920139/1/OS1

IE01
1/1

REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT NO. 50-400/92-15

VIOLATION (400/92-15-01)

Reported Violation:

Technical Specification 6.8.1.a requires that written procedures be established and implemented covering procedures outlined in Appendix A of Regulatory Guide 1.33, Revision 2, 1978.

Regulatory Guide 1.33, Appendix A, paragraphs 2 and 3, requires procedures for refueling preparations and for operation of the chemical and volume control system.

Refueling procedure FMP-106, New Fuel Receipt Inspection, Section 6.3, specifies that wet annular burnable absorber inserts be handled using a flexible strap attached to the assembly handling tool T-bar.

Operating procedure OP-107, Chemical and Volume Control System, Section 8.8, specifies that the bypass valve be opened prior to backflushing the reactor coolant pump seal return filter.

Contrary to the above,

1. On July 30, 1992, a flexible strap was not utilized to handle the wet annular burnable absorber inserts during inspection.

2. On August 7, 1992, the bypass valve was not opened to allow backflushing of the seal return filter which allowed the system flow to be isolated and system pressure increased, which challenged a seal return relief valve.

This is a Severity Level IV violation (Supplement I).

Denial or Admission:

The violation is admitted.

Reason for the Violation:

(Example 1)

At 13:45 on July 30, 1992, Operations and Technical Support personnel began inspection of the new fuel inserts. Operations located a flexible strap to use as instructed by the Technical Support Reactor Engineer. The strap was put on the new fuel insert (by lifting the insert slightly by hand to slip the strap through the T-bar) and the auxiliary crane was used to lift it up for inspection. The new fuel inserts weigh approximately 30 pounds and personnel decided it would be safer and more efficient to lift the inserts by hand since the procedure took less than 1 minute per insert to perform.

Operations personnel utilized procedure FHP-003, Unpacking and Handling of New Fuel Assemblies, Fuel Inserts, and New Fuel Shipping Containers, to unpack and handle the new fuel assemblies. Although FHP-003 references FMP-106, a Technical Support procedure, for the inspection, Operations personnel assisting with the inspection were not aware of the handling requirements of FMP-106 to use a flexible strap.

REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT NO. 50-400/92-15
(continued)

Reason for the Violation: (continued)

(Example 2)

At 02:45 on August 7, 1992, the Radwaste (RW) operators requested permission from the Main Control Room (MCR) to backflush the Reactor Coolant Pump (RCP) Seal Return Filter. The MCR operator granted permission to backflush the filter prior to ensuring that the Seal Return Filter Bypass valve was opened as required by OP-107.

The RW operator commenced the backflush operation in accordance with OP-120.02.39, Fuel Handling Building and Reactor Auxiliary Building Filter Backflush, by closing the filter inlet and outlet isolation valves. The RW operator almost immediately received the Seal Water Return High ΔP alarm, coincident with a MCR B RCP Seal Return Low Flow alarm, and the RW operator immediately opened the filter inlet and outlet isolation valves and notified the MCR.

The MCR and RW determined that the Seal Return Filter Bypass valve needed to be opened and that procedure OP-107 contained directions for opening the filter bypass valve. The root cause of this violation is attributed to the MCR Operator not being familiar with the section of OP-107 that covered the MCR actions for filter backwashes.

Corrective Steps Taken and Results Achieved:

(Example 1)

The failure to follow procedure FMP-106 was not identified until after the insert inspections were successfully completed. Although a procedure violation occurred, the failure to use a flexible strap did not adversely impact the inspection evolution.

(Example 2)

Following discussions between RW and the MCR concerning the need to open the filter bypass valve prior to initiating the filter backflush, the backflush evolution was initiated and completed without further incident.

Corrective Steps Taken to Avoid Further Violations:

(Example 1)

Fuel Handling Procedures FHP-003 and FHP-002, Handling Limitations for New and Irradiated Fuel Inserts, will be revised to specifically describe the handling requirements for new fuel inserts prior to receipt of new fuel for Cycle 6. Training will be provided for Operations personnel prior to the handling of new fuel inserts.

REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT NO. 50-400/92-15
(continued)

Corrective Steps Taken to Avoid Further Violations: (continued)

(Example 2)

An Operations Night Order was issued on August 17, 1992, to inform MCR operations shift personnel of the incident. The incident has been reviewed with the individual operator involved. This review included a review of the applicable steps in OP-107 that address the backflush of the seal return filter.

Several filters require interaction between the MCR and the RW Control Room to complete the filter backwash cycle. As an additional measure, RW procedure OP-120.02.39 has been changed to identify the action required by the MCR, for example, open 1CS-302, Seal Water Return Filter Bypass Valve. This second check will ensure the appropriate action has occurred prior to initiating the filter backwash.

Date When Full Compliance Will Be Achieved:

(Example 1)

Full compliance is pending revision to FHP-002 and FHP-003 and associated training as stated above. This action will be completed by December 31, 1993.

(Example 2)

Full compliance was achieved on October 19, 1992.